

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA

CAROL M. MCDONUOUGH, et. al.,

Plaintiffs,

v.

TOYS "R" US, INC., d/b/a Babies "R" Us,
et. al.,

Defendants.

No. 2:06-cv-0242-AB

ARIEL ELLIOTT, et. al.,

Plaintiffs,

v.

TOYS "R" US, INC., d/b/a Babies "R" Us,
et. al.,

Defendants.

No. 2:09-cv-06151-AB

USDC-EDP
REC'D
JUN 10 2011
P 7 20

**OBJECTION TO CLASS SETTLEMENT AND APPLICATION
FOR ATTORNEYS' FEES AND EXPENSES**

I, Clark Hampe, Objector, appear herein pro se and file this Objection to Class Settlement and Application for Attorneys' Fees and Expenses. My address is 4063 Dunhaven Road, Dallas, Texas 75220, and my telephone number is (214) 403-4770.

I purchased a Britax car seat model Marathon 70 from Toys "R" Us/Babies R Us on December 18, 2010. I am therefore a class member. A copy of my claim form is attached hereto as Exh. A. I request that this Objection be submitted to the Court without an oral hearing, and I do not requests to speak at the Fairness Hearing.

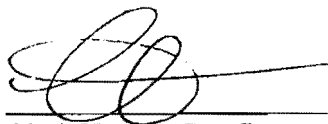
First, objection is made to the class notice. The class notice is vague and the class definition is ambiguous.

Second, objection is made to the extent the separate sub-classes do not have separate and independent counsel on behalf of each sub-class that negotiated and settled on behalf of each sub-class. To the extent proper boundaries were not adhered to, the attorneys for the class have compromised their impartiality and duty to represent their clients by playing one sub-class off of another in the settlement process. Objection is made to the extent class counsel has violated its duty of impartiality and to the extent class counsel has a conflict of interest. Objection is made to the extent class counsel does not discharge its burden of proof that it had no conflict of interest and that each sub-class was represented separately in all respects.

Third, objection is made that the proponents of this settlement have not discharged their burden of proof that the settlement is fair, adequate and reasonable. Objection is made that the amount of the total settlement is inadequate and that the Britax sub-class' portion of the settlement is inadequate.

Fourth, objection is made to the amount of attorneys' fees sought on both a lodestar and percentage of recovery basis. Objection is also made to counsel receiving attorneys' fees to the extent they have a conflict of interest as described above.

Wherefore, premises considered, I, Clark Hampe, object to the proposed settlement and requests that the settlement and the requested attorneys' fees be denied in all respects.



Clark Hampe, Pro Se
4063 Dunhaven Road
Dallas, Texas 75220
T: (214) 403-4770
Email: clarkhampe@hotmail.com

CETIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been duly served
on counsel as indicated below:

Via Hand Delivery

Clerk of the Court
U.S. Court for the Eastern District of Pennsylvania
601 Market Street
Philadelphia, Pennsylvania 19106

Via Certified Mail-RRR

Eugene A. Spector
Spector Roseman Kodroff & Williss, P.C.
1818 Market Street, Ste. 2500
Philadelphia, Pennsylvania 19103
*Co-Lead Counsel for Plaintiffs
& Settlement Subclasses*

Via Certified Mail-RRR

Mark L. Weyman
Reed Smith LLP
599 Lexington Avenue
New York, New York 10022
*Counsel for Defendants Toys "R"
Us, Inc. and Babies "R" Us, Inc.
Toys "R" Us-Delaware, Inc.*



Clark Hampe, Pro Se

**Must be Postmarked
No Later Than
August 1, 2011**

BABY PRODUCTS ANTITRUST LITIGATION SETTLEMENT
c/o The Garden City Group, Inc.
PO Box 9679
Dublin, Ohio 43017-4979
1-888-292-8492
Fax: 1-888-476-7153

Email: questions@babyproductsantitrustsettlement.com



BBA

Claim Number:

Control Number:

CLAIM FORM AND RELEASE

Your Signed Claim Must be Postmarked, Faxed or Sent Electronically in PDF Format To The Claims Administrator No Later than August 1, 2011

1. WHAT THIS CLAIM FORM CONCERNS

This claim form concerns the settlement of two consolidated lawsuits that were filed by two groups of consumers claiming that Toys "R" Us and Babies "R" Us had conspired with certain baby product manufacturers to restrict competition in violation of federal antitrust law. Plaintiffs assert that this conduct caused you to pay higher prices at Toys "R" Us and Babies "R" Us for: BabyBjörn baby carriers; Britax car seats; Maclaren strollers; Medela Pump In Style breast pumps; Peg Perego car seats, strollers and high chairs; and all Kids Line products, such as crib sets, blankets, valances, sheets, wall decorations, baskets, pillows, pads, hampers, porta crib sets, lamps, shelves, stackers, rugs, or mobiles. Plaintiffs' claims are disputed and Defendants deny entering into any conspiracies or engaging in any other unlawful conduct. The parties have agreed to settle the litigation in lieu of trial.

Please read the Full Notice (available at www.babyproductsantitrustsettlement.com) carefully before filling out this Form.

2. ELIGIBLE PAYMENTS

You may be eligible to recover a payment from the settlement for each of the following products you purchased at Toys "R" Us or Babies "R" Us during the time periods indicated:

- BabyBjörn baby carriers between February 2, 2000 and April 30, 2005;
- Britax car seats between January 1, 1999 and January 31, 2011;
- Maclaren strollers between October 1, 1999 and January 31, 2011;
- Medela Pump In Style breast pumps between July 1, 1999 and January 31, 2011;
- Peg Perego car seats, strollers or high chairs between July 1, 1999 and January 31, 2011; and/or
- All Kids Line products between January 1, 1999 and December 31, 2006.

You may be eligible to recover a payment from the settlement for all purchases for which you provide a proper claim form. This is described in greater detail in the Full Notice available at www.babyproductsantitrustsettlement.com.

3. HOW YOU CAN QUALIFY FOR AND RECEIVE PAYMENT

In order to be eligible to receive any compensation from the settlement, you must:

- fill out this Claim Form in its entirety;
- sign the verification statement at the end of the Claim Form;
- return this completed Claim Form with your supporting documentation, if any, no later than August 1, 2011.

All information submitted will be kept confidential.

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PART I - CLAIMANT IDENTIFICATION

Claimant Name(s) (as you would like the name(s) to appear on the check, if eligible for payment):

CLARK HAMPE

Name of the Person you would like the Claims Administrator to Contact Regarding This Claim (if different from the Claimant Name(s) listed above):

SELF

Claimant or Representative Contact Information:

The Claims Administrator will use this information for all communications relevant to this Claim (including the check, if eligible for payment). If this information changes, you **MUST** notify the Claims Administrator in writing.

Street Address:

4063 DUNHAVEN ROAD

City:

DALLAS

State and Zip Code:

TX 75220

Country (Other than U.S.):

Daytime Telephone Number: (214) 403 - 4770

Evening Telephone Number: (214) 403 - 4770

Email Address: CLARKHAMPE@HOTMAIL.COM

(Email address is not required, but if you provide it you authorize the Claims Administrator to use it in providing you with information relevant to this claim.)

PART II - BABY PRODUCT PURCHASE INFORMATION

You may be entitled to a settlement payment for each of the baby products listed above you purchased at Toys "R" Us or Babies "R" Us during the time periods indicated. To recover the maximum amount you can from the Settlement Fund for your purchases, attach documentation showing your purchase(s) of the products listed above. Acceptable proof may include receipts, cancelled checks, credit card statements, records from Toys "R" Us or Babies "R" Us, or other records that show you purchased the baby product and when the purchase was made. In order to allow the Claims Administrator to verify your documentation, you must complete the following chart.

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**PART II - BABY PRODUCT PURCHASE INFORMATION (CONTINUED)**

Date of Purchase	Place of Purchase (Toys "R" Us or Babies "R" Us)	Product Purchased	Proof of Purchase Attached
12 / 18 / 2010	On-Line Y <input type="checkbox"/> N <input checked="" type="checkbox"/> Store <u>TOYS "R" US / BABIES "R" US</u> City <u>DALLAS</u> State <u>TEXAS</u>	Brand <u>BRITAX</u> (e.g. name of manufacturer) Type <u>CAR SEAT</u> (e.g. stroller) Model <u>MARATHON 70</u> Price <u>\$279.00</u>	Y <input type="checkbox"/> N <input checked="" type="checkbox"/>
/ /	On-Line Y <input type="checkbox"/> N <input type="checkbox"/> Store _____ City _____ State _____	Brand _____ (e.g. name of manufacturer) Type _____ (e.g. stroller) Model _____ Price _____	Y <input type="checkbox"/> N <input type="checkbox"/>
/ /	On-Line Y <input type="checkbox"/> N <input type="checkbox"/> Store _____ City _____ State _____	Brand _____ (e.g. name of manufacturer) Type _____ (e.g. stroller) Model _____ Price _____	Y <input type="checkbox"/> N <input type="checkbox"/>
/ /	On-Line Y <input type="checkbox"/> N <input type="checkbox"/> Store _____ City _____ State _____	Brand _____ (e.g. name of manufacturer) Type _____ (e.g. stroller) Model _____ Price _____	Y <input type="checkbox"/> N <input type="checkbox"/>
/ /	On-Line Y <input type="checkbox"/> N <input type="checkbox"/> Store _____ City _____ State _____	Brand _____ (e.g. name of manufacturer) Type _____ (e.g. stroller) Model _____ Price _____	Y <input type="checkbox"/> N <input type="checkbox"/>

IF YOU NEED ADDITIONAL SPACE TO LIST YOUR PURCHASES YOU **MUST** PHOTOCOPY THIS PAGE AND CHECK THIS BOX ☐ IF YOU DO NOT CHECK THIS BOX THESE ADDITIONAL PAGES WILL **NOT** BE REVIEWED



PART III - VERIFICATION

I declare under penalty of perjury of the laws of the United States of America that all the information provided in this Claim Form is, to the best of my knowledge, accurate and correct.

Signature

6/5/2011

Date

Please keep a copy of your completed Claim Form and copies of any attached documentation for your records.

Please mail, fax or email your completed Claim Form, with your proofs of purchase, to:

BABY PRODUCTS ANTITRUST LITIGATION SETTLEMENT

c/o The Garden City Group, Inc.

PO Box 9679

Dublin, Ohio 43017-4979

Fax: 1-888-476-7153

Email: questions@babyproductsantitrustsettlement.com

Your Signed Claim Must be Postmarked, Faxed or Sent Electronically in PDF Format To The Claims Administrator So That It is Postmarked or Received No Later than August 1, 2011.